

To: Honorable Judge Noel L. Hillman  
United States District Court  
District Of New Jersey  
400 Cooper Street  
Camden, New Jersey 08102

From: Jeremy Williams  
RN: 63734-054  
FPC-Schuylkill Unit-2  
P.O. Box 670  
Minersville, PA 17954-0670

**RECEIVED**

**AUG 14 2014**

**AT 8:30  
WILLIAM T. WALSH CLERK**

Re: Jeremy Williams v. Drug Enforcement Administration  
Case No. 1:12-cv-00850-NLH-JS

Dated: August 10<sup>th</sup>, 2014

Dear Clerk,

Enclosed you will find plaintiff-claimant's supplemental response to the motion [15]. All concerned parties have been served as is reflected in the 'proof of service'. Kindly list the same before the court and please acknowledge receipt of this response.

I thank you for your time and attention.

Sincerely,

/s/ Jeremy Williams  
Jeremy Williams

United States District Court  
District Of New Jersey

Jeremy Williams	:
Plaintiff-Claimant	:
	:
	:
	: No. 1:12-cv-00850-NLH-JS
	:
v.	:
	:
	: Civil Action
	:
Drug Enforcement Administration	:
Defendant-Respondents	:

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Affidavit with Motion(s) For Reduction of Time For Defendant, DEA To Respond To Plaintiff's Interrogatories And Admissions Within 10 days; or For The Court To Give The Parties 75 days RE: Summary Judgement Restructuring, And For Leave To Amend The Complaint Under 42 USC § 1983, 1985, and Rule 41(g)

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Comes now Jeremy Williams, and for the reasons, critical factual development needs to be presented. Since the court converted the pleadings into one for Summary Judgement under Fed. R. Civ. P., Rule 56, plaintiff hereby files this affidavit with motion(s) for reduction of time for defendant, DEA to respond to plaintiff's interrogatories and admissions within 10 days; or for the court to give the parties 75 days Re: Summary Judgement Restructuring, and for leave to amend the complaint under 42 USC § 1983, 1985, and Rule 41(g). For the following reasons:

1. On July 31st 2014, this honorable court ordered the pleadings between the parties to be converted from a motion to dismiss under 12(b) to one for Summary Judgement under Rule 56.
2. Plaintiff is a black male (African American) which the court may take **Judicial Notice** of from the court's files. And, it is because of his race why the DEA, white agents deprived him of his BMW and charged him with federal crimes in the first place. The following are the plaintiff's requested leave to amend his complaint.

42 USC § 1983-Civil Rights Violations

3. Jurisdiction exist pursuant to 42 USC § 1983. Plaintiff's rights to his property, A 2006 BMW was deprived by the defendant, DEA. And Agents deprived him of his rights to his property in violation of the U. S. Constitution; which secured his rights under color of law. And, such person or government entity is liable in civil penalty for such violations and wrongfully taking. See Exhibits 1-7. Plaintiff incorporates his original Complaint here.

**42 USC § 1985-Conspiracy**

4. Conspiracy to interfere with plaintiff's civil rights.

When the DEA and its agents unlawfully seized plaintiff's BMW it violated plaintiff's civil rights as they acted in a conspiracy to deprive plaintiff of his civil rights pursuant to the U. S. Constitution, 4th and 5th Amendment rights against unlawfully taking of his BMW without compensation. See Exhibits 1-7. Again Plaintiff incorporates his Complaint here.

**41(g) Unlawfully Taking Of property**

5. Plaintiff is aggrieved by the unlawfully seizure of his BMW by the DEA and its agents. And, if such is the case the complaint should be filed in the District Court where the property was seized; which is the District Court of New Jersey under civil action No. 1:12-cv-00850-NLH-JS. See Exhibits 1-7. Again Plaintiff's Complaint is realleged here as well.

**Summary Judgement Should Be Denied, Genuine Undisputed Fact(s) Exist**

6. All plaintiff need to show to defeat the government's, movant's, motion for Summary Judgement under Fed. R. Civ. P., Rule 56, is that there is a genuine issue of material fact in dispute. Here there are many facts in disputed as follows:

7. Plaintiff has alleged that his vehicle, A 2006 BMW was his and the government seized it in violation of his constitutional right under 41(g).

8. Plaintiff has alleged that the government deprived him of his BMW based on race (he is a black man and the takers were white men) in violation of his civil rights under 42 USC § 1983 and in violation of the U. S. Constitution 4th and 5th Amendments, that they took his BMW based on race.

9. Plaintiff has alleged that the government, DEA, and its agents acted in a conspiracy to deprive him of his BMW in violation of 42 USC § 1985.

**Plaintiff Hereby Seeks Leave Of Court To Renew His Complaint And Enhance Facts**

10. The Court Allowed the defendant, DEA's sworn statements/declarations (not appropriate for the 12(b) motion) and accepted them as part of its created Summary Judgement. And, the court also required plaintiff to prove Jurisdiction of the court; and gave plaintiff 20 days to respond.

11. In order for plaintiff to defeat Summary Judgement plaintiff realleges that his BMW was taken by the government without a right of reasonable opportunity for plaintiff to defend. The BMW was purchased from an automobile accident settlement involving (plaintiff insurance claim payment) in 2009. And there was never any evidence or proof in plaintiff's plea (when the matter was U.S. v. Jeremy Williams) remotely connecting plaintiff's BMW to any crime or being used in anyway to further illegal drug activity.

Plaintiff incorporated every word above and below as well as exhibits 1-7 attached to all of these pleadings filed today with his combined affidavit. And, Relies on the court's inherent power and duty of fairness since plaintiff is a pro se litigant. And, has no computer to re-state and re-type everything in pretty little sections.

12. Plaintiff has submitted his sworn affidavit, which alleges genuine issues of material facts which precludes the granting of a Summary Judgement particularly where the court is required to view the allegations of facts in the light most favorable to the non-movant party, plaintiff, Jeremy Williams, herein.

**Points & Authorities**

13. Plaintiff presents his case opposing Summary Judgement and cites the landmark case of Anderson v. Liberty Lobb, Inc., 477 U.S. 242, 248 (1986) et. al. Since both parties rely on Anderson v. Liberty Lobb, Inc., the pleadings submitted herein, with the additional pleadings to be supplemented by defendant's

(a) Admissions and (b) Answer to Interrogatories.

14. Plaintiff also, relies in this court's inherent powers and sense of reasons and judgement.

Plaintiff's car had nothing to do with his conviction and there is no evidence that plaintiff used his BMW to further any drug dealing or any illegality. See plaintiff's affidavit and motion(s).

Wherefore, it is respectfully requested that plaintiff's motion seeking jurisdiction of the court be granted and that the court denies any motion for Summary Judgement for the government, DEA.

  
Jeremy Williams, Pro SE

Affidavit Under Oath

I, Jeremy Williams, State under penalty of perjury, that to the best of my knowledge and belief the information and facts stated in this affidavit and in the motion(s) are true; and that if, and when called to testify in court, plaintiff would again swear before this court that every fact stated in this affidavit and motion(s) are true.

Dated: August 10<sup>th</sup> 2014

Jeremy Williams  
Jeremy Williams

Certificate Of Service

I, Jeremy Williams, Hereby certify that I did cause to be mailed A true and correct copy of the within Affidavit with Motion, and exhibits to the following, via first class postage, From FPC-Schuylkill, P.O. Box 670, Minersville, PA 17954 on this 10<sup>th</sup> day of August 2014; to:

Paul J. Fishman, esq.  
United States Attorney  
970 Broad Street, Suite 700  
Newark, New Jersey 07102

Certificate In Lieu Of Oath

I, Jeremy Williams, hereby certify that the above statements made by me are true and correct, and I am aware of the penalties for false swearing. Invoking 28 USC § 1746, penalty of perjury.

Dated: August 10<sup>th</sup> 2014

/s/ Jeremy Williams  
Jeremy Williams



Page 1 of 2 Pages

New York State Department of Motor Vehicles

## POLICE ACCIDENT REPORT (NYC)

MV-104AN (5/04)

Precinct	49
Accident No.	2136

Complaint Number

☐ AMENDED REPORT

Accident Date Month: 10, Day: 18, Year: 2009	Day of Week SUNDAY	Military Time 1330	No. of Vehicles 3	No. Injured 1	No. Killed 0	Not Investigated at Scene <input type="checkbox"/>	Left Scene <input type="checkbox"/>	Police Photos <input type="checkbox"/> Yes <input type="checkbox"/> No			
VEHICLE 1			VEHICLE 2 <input type="checkbox"/> BICYCLIST <input type="checkbox"/> PEDESTRIAN <input type="checkbox"/> OTHER PEDESTRIAN								
VEHICLE 1 - Driver License ID Number: 689 388 006			State of Lic.: NY			VEHICLE 2 - Driver License ID Number: 747 220 795			State of Lic.: NY		
Driver Name - exactly as printed on license: SANTIAGO, TAHNISHA, R			Driver Name - exactly as printed on license: VERA, RICHARD								
Address (Include Number & Street): 917 TILDEN STREET			Apt. No.: 2			Address (Include Number & Street): 1841 BOGAERT AVE			Apt. No.: 2		
City or Town: BRONX			State: NY			City or Town: BRONX			State: NY		
Zip Code: 10469			Zip Code: 10462								
Date of Birth: 11/03/78	Sex: F	Unlicensed: <input type="checkbox"/>	No. of Occupants: 1	Public Property Damaged: <input type="checkbox"/>	Date of Birth: 09/26/63	Sex:	Unlicensed: <input type="checkbox"/>	No. of Occupants:	Public Property Damaged: <input type="checkbox"/>		
Name - exactly as printed on registration: WILLIAMS, JEREMY			Sex:			Name - exactly as printed on registration: YNFAUTO RAFAEL, R			Sex:		
Address (Include Number & Street): 17 W 139 <sup>TH</sup> ST. A			Apt. No.: 3E			Address (Include Number & Street): 168 HAYWARD ST.			Apt. No.:		
City or Town: NEW YORK, NY			State: NY			City or Town: YONKERS			State: NY		
Zip Code: 10037			Zip Code: 10704-1807								
Plate Number: EMH5790	State of Reg.: NY	Vehicle Year & Make: 2002 JEEP	Vehicle Type: SUV	Ins. Code: 193	Plate Number: BCP2752	State of Reg.: NY	Vehicle Year & Make: 1998 DODGE	Vehicle Type: SUV	Ins. Code: 639		
Ticket/Arrest Number(s):			Ticket/Arrest Number(s):								
Violation Section(s):			Violation Section(s):								

Check if involved vehicle is: <input type="checkbox"/> more than 95 inches wide; <input type="checkbox"/> more than 34 feet long; <input type="checkbox"/> operated with an overweight permit; <input type="checkbox"/> operated with an overdimension permit.	Check if involved vehicle is: <input type="checkbox"/> more than 95 inches wide; <input type="checkbox"/> more than 34 feet long; <input type="checkbox"/> operated with an overweight permit; <input type="checkbox"/> operated with an overdimension permit.	Circle the diagram below that describes the accident, or draw your own diagram in space #9. Number the vehicles.
<b>VEHICLE 1 DAMAGE CODES</b> Box 1 - Point of Impact: 10 10 Box 2 - Most Damage: 3 4 5 Enter up to three more Damage Codes: 3 4 5	<b>VEHICLE 2 DAMAGE CODES</b> Box 1 - Point of Impact: 2 2 Box 2 - Most Damage: 3 1 5 Enter up to three more Damage Codes: 3 1 5	Rear End: 1. Left Turn: 3. Right Angle: 4. Right Turn: 5. Head On: 7. Sideswipe (same direction): 2. Left Turn: 0. Right Turn: 6. Sideswipe (opposite direction): 8.
Vehicle By Towed: To:	Vehicle By Towed: To:	ACCIDENT DIAGRAM 
VEHICLE DAMAGE CODING: 1-13. SEE DIAGRAM ON RIGHT. 14. UNDERCARRIAGE 17. DEMOLISHED 15. TRAILER 18. NO DAMAGE 16. OVERTURNED 19. OTHER		Cost of repairs to any one vehicle will be more than \$1000. <input type="checkbox"/> Unknown/Unable to Determine <input type="checkbox"/> Yes <input type="checkbox"/> No

Reference Marker	Coordinates (if available)	Place Where Accident Occurred: <input checked="" type="checkbox"/> BRONX <input type="checkbox"/> KINGS <input type="checkbox"/> NEW YORK <input type="checkbox"/> QUEENS <input type="checkbox"/> RICHMOND
	Latitude/Northing:	Road on which accident occurred: BOSTON RD.
		(Route Number or Street Name)
	Longitude/Easting:	at 1) intersecting street: YATES AVE
		(Route Number or Street Name)
		or 2) <input type="checkbox"/> N <input type="checkbox"/> S <input type="checkbox"/> E <input type="checkbox"/> W of _____
		(Milepost, Nearest Intersecting Route Number or Street Name)

Accident Description/Officer's Notes: AT TPO VI STATED SHE WAS PROCEEDING THROUGH INTERSECTION WHEN SHE WAS STRUCK BY V2. V2 STATED VI WAS PROCEEDING THROUGH INTERSECTION AND STOPPED SUDDENLY CAUSING HIM TO COLLIDE IN TO VI WHICH HE THEN LOST CONTROL OF HIS VEH WHERE HE COLLIDED INTO V3. VI REMOVED TO HOSPITAL.

	8	9	10	11	12	13	14	15	16	17	18	Names of all involved	Date of Death Only
A	1		4			F	10	14	6		7003	SANTIAGO, TAHNISHA, R	
B	2		4			M			6			VERA, RICHARD	
C													
D													
E													

**PERSONS KILLED OR INJURED IN ACCIDENT** (Letter designation of persons killed or injured must correspond with letter designation on front).

A Last Name <u>SANTIAGO</u> First <u>TAHNISHA</u> M.I. <u>R.</u>		D Last Name _____ First _____ M.I. _____	
Address <u>919 TILDEN ST. 2</u>		Address _____	
Date of Birth <u>11</u> Month <u>03</u> Day <u>78</u> Year Telephone (Area Code) _____		Date of Birth _____ Month _____ Day _____ Year Telephone (Area Code) _____	
B Last Name _____ First _____ M.I. _____		E Last Name _____ First _____ M.I. _____	
Address _____		Address _____	
Date of Birth _____ Month _____ Day _____ Year Telephone (Area Code) _____		Date of Birth _____ Month _____ Day _____ Year Telephone (Area Code) _____	
C Last Name _____ First _____ M.I. _____		Highway Dist. at Scene? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Address _____		Name: _____	
Date of Birth _____ Month _____ Day _____ Year Telephone (Area Code) _____		Shield No. _____	

**ENTER INSURANCE POLICY NUMBER FROM INSURANCE IDENTIFICATION CARD, EXPIRATION DATE (IN ALL CASES), AND VIN.**

Vehicle No. 1 A06-228-229680-40 8 Vehicle No. 2 4086493287  
 Expiration Date 11-19-2009 Expiration Date 01/27/2010  
 VIN 1J8GWN68J62C185159 VIN 2B7HB11X6WK124523

**WITNESS (Attach separate sheet, if necessary)**

Name _____	Address _____	Phone _____

**DUPLICATE COPY REQUIRED FOR:**

<input type="checkbox"/> Dept. of Motor Vehicles (if anyone is killed/injured)	<input type="checkbox"/> Motor Transport Division (P.D. vehicle involved)	<input type="checkbox"/> NYC Taxi & Limousine Comm. (if a Licensed taxi or limousine involved)	<input type="checkbox"/> Other City Agency (Specify) _____
<input type="checkbox"/> Office of Comptroller (if a City vehicle involved)	<input type="checkbox"/> Personnel Safety Unit (if a P.D. vehicle involved)	<input type="checkbox"/> Highway Unit _____	

**NOTIFICATIONS:** (Enter name, address, and relationship of friend or relative notified. If aided person is unidentified, list Missing Person Squad member who was notified. In either case, give date and time of notification.)

\_\_\_\_\_

\_\_\_\_\_

<b>PROPERTY DAMAGED (other than vehicles)</b>	<b>OWNER OF PROPERTY (include city agency, where applicable)</b>

**IF NYPD VEHICLE IS INVOLVED:**

Police Vehicle—Operator's First Name _____	Last Name _____	Rank _____	Shield No. _____	Tax ID. No. _____	Command _____
Make of Vehicle _____	Year _____	Type of Vehicle _____	Plate No. _____	Dept. Vehicle No. _____	Assigned To What Command _____

Equipment in Use At Time of Accident

Date/Time Reviewed _____	Reviewing Officer <u>SMITH</u>	Post/Sector <u>49</u>	NCIC No. <u>03030</u>	Tax ID No. <u>690699</u>	Officer's Rank and Signature <u>[Signature]</u>
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CLAIM OFFICE ADDRESS:

PO BOX 1051

MONTGOMERY TWP, NY 12936-1051

Liberty  
Mutual

B. CODE

251

CHECK REFERENCE  
24107513CHECK DATE  
10/26/09CHECK AMOUNT  
\*\*\*\$4500.00BLOCK NUMBER  
001414

CONTACT: SALA, TINA

PHONE: 800-252-5730

ACCIDENT DATE: 10/18/09

PAGE 1 OF 1

INSURED NAME: WILLIAMS, JEREMY

OSN: VV0101102601-001414

CLAIM NUMBER: 012684939-0001

POLICY NUMBER: A06-228-229680-408

INSURED OPERATOR: WILLIAMS, JEREMY

CLAIMANT NAME: WILLIAMS, JEREMY

COVERAGE	INVOICE NO	DATES OF SERVICE	CHARGES	PAID AMT	ADJUSTMENTS
COLLISION			4500.00	4500.00	
			TOTAL CHARGE:	4500.00	
			TOTAL PAID:	4500.00	
			TOTAL DEDUCTIBLE:	0.00	
			TOTAL WITHHOLDING:	0.00	
			CHECK AMOUNT:	4500.00	

## NOTES

THIS PAYMENT REPRESENTS PARTIAL PAYMENT ON THE TOTAL LOSS VALUE OF YOUR VEHICLE. COST TO REPAIR EXCEEDS THE VALUE OF YOUR VEHICLE PRIOR TO THE ACCIDENT.

Ex-2

PLEASE REFERENCE CLAIM NO AND SEND THIS EOP WITH ALL CORRESPONDENCE

CAREFULLY DETACH CHECK BEFORE DEPOSITING - RETAIN STATEMENT FOR YOUR RECORDS

2012-10-26 PM 12:08  
LIBERTY MUTUAL



The First Liberty Insurance Corporation  
PO Box 1051

Montgomery Twp NY 18936-1051  
Tel: (800) 252-5730 / (800) 252-5730  
Fax: (800) 632-3689

November 02, 2009

JEREMY WILLIAMS  
15 W 139TH ST APT 3E  
NEW YORK NY 10037-1512

CLAIM NUMBER: PD203-012684939-01  
DATE OF LOSS: 10/18/2009

Dear Mr. Williams:

The enclosed check for \$9244.31 represents the final payment for this loss.

**Please Note:** We will attempt to recover the full amount of your loss, including your deductible, from the other party involved in the accident. This recovery effort, or "subrogation," will be handled by our Islandia Subrogation Unit. The subrogation process usually takes some time and we will notify you as soon as we know the outcome.

It has been our pleasure to assist you with your claim. If you have questions about any aspect of your settlement, please call me at the number listed above, extension 7276537.

Sincerely,

MELISSA JEGEDE  
Claims Department

Enclosure

PLEASE BE ADVISED THAT YOUR CHECK HAS BEEN SENT IN SEPARATE ENVELOPE.



New York State Department of Motor Vehicles  
RETAIL CERTIFICATE OF SALE

No. 35247349

TYPE OF SALE	
<input type="checkbox"/> WHOLESALE OR	<input type="checkbox"/> RETAIL:
<input type="checkbox"/> New	<input type="checkbox"/> Used <input type="checkbox"/> Demo <input type="checkbox"/> Salvage

## VEHICLE INFORMATION:

Year	Make	Model	Body Type	Color	Weight (Unladen)	Fuel Type	Cylinders	Adult Seating Capacity
06	Buick	330	LTZ	04	3071	G	6	4
Vehicle Identification Number			Lien(s)	Inspection Certificate Number	Date of Inspection	Inspection Station Number		
WBAND335A14W59575			LO	NA	NA	70712410		
Plate/Permit Number		Number of Dealer Plate Loaned	<input type="checkbox"/> Lease Buyout (Insp. Not Required)		Selling Price			
NA		NA						

## DEALER INFORMATION (Print Name and Address)

HUXBON, MICHAEL BUICK (RUC 2002 SOUTH PO) PARKERSPSIE

## PURCHASER INFORMATION (Print Name and Address)

Weichardt, Muffin Shop, 714 Southern Blvd, Roseton, NY 12451

Date of Sale 10/28/09

## PRIOR OWNER INFORMATION (Print Name and Address Source of Ownership)

ALMA W. SICKLE, 970 MCCLURE ST, 10512

Date of Purchase 9/15/09

## ODOMETER DISCLOSURE STATEMENT

Federal and state laws require that you state the mileage of the vehicle described on this certificate, when transferring ownership. Failure to do so, or not telling the truth about the mileage may result in fines and/or imprisonment.

The odometer on the vehicle described above has: ☐ 5 digits ☒ 6 digits, not including tenths☒ I certify that, to the best of my knowledge, this odometer reading reflects the "ACTUAL MILEAGE" of the vehicle described above.☐ I certify that, to the best of my knowledge, this odometer reading "EXCEEDS MECHANICAL LIMITS."☐ I certify that, to the best of my knowledge, this odometer reading is "NOT THE ACTUAL MILEAGE. WARNING: ODOMETER DISCREPANCY."

ODOMETER READING				
1	6	9	6	1
(no tenths)				

## DEALER CERTIFICATION:

I certify: The vehicle described above was sold to the purchaser on the date indicated. At the time of delivery the purchaser was entitled to register the vehicle. This vehicle complied with equipment requirements of the Commissioner's Regulations. At the time of delivery, such equipment was in condition and repair to render satisfactory and adequate service on the public highway under normal use. Equipment certification does not apply to a vehicle sold as new, wholesale, or salvage. All New York State and local taxes due as a result of this sale have been collected from the purchaser. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

DEALER (or authorized representative) - (SIGN full name)	PRINT full name of dealer or authorized rep.	Date	Dealer Facility No.
<i>[Signature]</i>	Huxbon, Michael	10/28/09	70712410
PURCHASER - (SIGN full name)	PRINT full name of purchaser	Date	Selling Dealer NYS Sales Tax No.
<i>[Signature]</i>	Weichardt, Muffin Shop	10/28/09	1338302760

MV-50 (03/04)

PART 3 — CUSTOMER COPY  
ANY CHANGE OR ALTERATION VOIDS THIS CERTIFICATE

EX-4

CLAIM CASE ADDRESS:  
 PO BOX 1051  
 MONTGOMERY TWP, NY 18936-1051



B. CODE

251

CHECK REFERENCE 24156402	CHECK DATE 11/03/09
CHECK AMOUNT ***\$4744.31	BLOCK NUMBER 001528

CONTACT: JEGEDE, MELISSA  
 PHONE: 800-252-5730

ACCIDENT DATE: 10/18/09

PAGE 1 OF 1

INSURED NAME: WILLIAMS, JEREMY

OSN: VV0101110301-001528

CLAIM NUMBER: 012684939-0001

CLAIMANT NAME: WILLIAMS, JEREMY

POLICY NUMBER: A06-228-229680-408

INSURED OPERATOR: WILLIAMS, JEREMY

COVERAGE	INVOICE NO	DATES OF SERVICE	CHARGES	PAID AMT	ADJUSTMENTS
COLLISION			9744.31	5244.31	99
PAYMENT TO: JEREMY WILLIAMS			TOTAL CHARGE:	9744.31	
			TOTAL PAID:	5244.31	
			TOTAL DEDUCTIBLE:	500.00	
			TOTAL WITHHOLDING:	0.00	
			CHECK AMOUNT:	4744.31	

## ADJUSTMENT CODE NOTES:

99 99 - OTHER

## NOTES

THANK YOU FOR INSURING WITH LIBERTY MUTUAL

Ex-5

PLEASE REFERENCE CLAIM NO AND SEND THIS EOP WITH ALL CORRESPONDENCE

CAREFULLY DETACH CHECK BEFORE DEPOSITING - RETAIN STATEMENT FOR YOUR RECORDS


2012 FEB 15 PM 12:08  
 1



Exhibit

WILLIAMS, JEREMY  
17 W 139 ST APT 3E  
NEW YORK NY 10037

000256

NEW YORK STATE						
Title and Identification No.		Year	Make	Model Code	Body/Hull	Document No.
WBAVD33596KV59575		2006	BMW	330	4DSD	496749C
Color	Wt./Sts./Lgth.	Fuel	Cyl./Prop.	New or Used	Type of Title	Date Issued
LT/BL	3671	GAS	6	USED	VEHICLE	11/19/09
Name and Address of Owner(s)			ODOMETER READING: 69612			
WILLIAMS, JEREMY 17 W 139 ST APT 3E NEW YORK NY 10037						

This document is your proof of ownership for this vehicle, boat or manufactured home. Keep it in a safe place, not with your license or registration or in your vehicle or boat. To dispose of your vehicle, boat or manufactured home, complete the transfer section on the back and give this to the new owner.

Lienholder

Lienholder




Lienholder

Lienholder




ABRAMSON & MORAK  
ATTORNEYS AT LAW  
35 WORTH STREET  
NEW YORK, NEW YORK 10013  
www.abramsonmorak.com

ALAN M. ABRAMSON\*  
GLENN H. MORAK

ASHLEY M. HEANEY\*

\*MEMBER OF NEW YORK AND CONNECTICUT BARS

(212) 226-7098  
FAX (212) 226-4559

September 21, 2010

Asset Forfeiture Section  
Office of Operations Management,  
Drug Enforcement Administration  
8701 Morrisette Drive  
Springfield, VA 22152

Re: DEA Case No.: C1-07-Z059  
Asset ID No.: 10-DEA-535331

To Whom It May Concern:

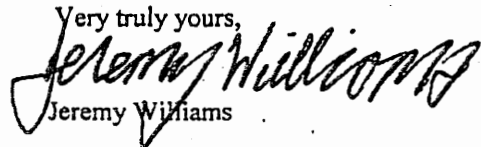
My name is Jeremy Williams. On July 22, 2010, my 2006 BMW 330i was seized by the Drug Enforcement Administration.

I understand this vehicle was seized in connection with my arrest. This car was bought after the settlement of a car accident involving our 2002-Jeep Grand Cherokee. I have included my insurance information regarding payment to prove ownership.

Please accept this letter as my petition for pardon of forfeiture. I am requesting the return of my vehicle. Please feel free to communicate directly with the law firm of Abramson & Morak, 35 Worth Street, New York, NY 10011; Phone 212-226-7098.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 27, 2010.

Very truly yours,  
  
Jeremy Williams

SWORN TO ME THIS OF SEPTEMBER 2010

  
NOTARY PUBLIC

ASHLEY M. MOORE  
Notary Public, State of New York  
NO. 02MO08172681  
Qualified in New York County  
Commission Expires Aug. 13, 2011

RECEIVED SECTION  
2010 SEP 29 PM 1:55

Exhibit 11

1094

EX-7

United States District Court  
District Of New Jersey

Jeremy Williams	:	
Plaintiff-Claimant	:	
	:	
	:	No. 1:12-cv-00850NLH-JS
	:	
v.	:	
	:	
	:	Civil Action
	:	
Drug Enforcement Administration :	:	
Defendant-Respondents	:	

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**Plaintiff's First Set Of Interrogatories To Defendant, DEA**

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Interrogatories to Defendant, DEA:

Comes now plaintiff, Jeremy Williams, files his request for interrogatories pursuant to Fed. R. Civ. P., Rule 33, since the court converted the parties pleadings from a motion to dismiss under 12(b) to one for Summary Judgment; the defendant answers to interrogatories is critical for plaintiff to respond to Summary Judgment. These are the interrogatories requests as follows:

1. State whether the government's entity named in this lawsuit is the proper party to be sued. And, if not who is the proper party.
2. State whether the government took plaintiff's BMW, A 2006 sedan automobile from plaintiff's home parking lot. And, if so name the division of the government who authorized the taking and the supervisor's name.
3. State whether the government took plaintiff's automobile without a warrant.
4. State whether the government gave any notice of the government's

seizure or attempted forfeiture occurred while plaintiff was incarcerated in Metropolitan Correctional Center, 150 Park Row, New York, Ny 10007.

5. State whether the government under such circumstances plaintiff had no ability to exercise his right to claim automobile because he was fighting for his freedom.

6. State whether the government over the past 10 years under these facts and circumstances the government has been ordered by a court, with jurisdiction to return said automobile to the owner.

7. State whether the government in similar complaints the U.S. District Court's exercised jurisdiction particularly in personal property claim cases.

8. State whether the government in any separate hearing conducted by the government that no notice was ever submitted to plaintiff of a court date when the government sought to permanently deprive plaintiff of his BMW.

9. State whether the government acted to permanently deprive plaintiff of his BMW. The government knew where plaintiff was incarcerated, but failed to produce plaintiff with reasonable notice as required by the U. S. Constitution, 4th Amendment and 5th Amendment.

10. State whether the government on September 21, 2010 plaintiff's attorney's Abramson & Morak, submitted to the defendant, DEA, clearly proving that the subject BMW was purchased, and that plaintiff purchased it from proceeds of a automobile accident in 2009. See Exhibits 1-7.

11. State whether the government knew plaintiff did not use the said BMW to further any illegal drug activity. The DEA still



seized the automobile. And, is now trying to keep plaintiff's BMW in violation of the federal laws and U. S. Constitution.

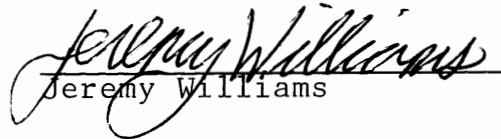
12. State whether plaintiff is a black male and that the agents who deprived plaintiff of his BMW were white males; and name the said white males.

**Notice To Defendant DEA**

You are required to answer the above interrogatories questions and state the name of the person answering. And, if you will not agree to prove such answers within 10 days (as opposed to 30 days the law requires), the attached motion to shorten time to answer is hereby filed with the court.

Respectfully Submitted

Dated: August 10<sup>th</sup> 2014

  
Jeremy Williams

Certificate Of Service

I, jeremy Williams, Hereby certify that I did cause to be mailed a true and correct copy of the within Interrogatories and exhibits to the following, via first class postage, from FPC-Schuylkill, P. O. Box 670, Minersville, PA 17954 on This 10<sup>th</sup> day of August 2014; To:

Paul J. Fishman  
United States Attorney  
970 Broad Street, Suite 700  
Newark, New Jersey 07102

Certificate InLieu Of Oath

I, Jeremy Williams, hereby certify that the above statements made by me are true and correct, and I am aware of the penalties for false swearing. Invoking 28 USC § 1746, penalty of perjury.

Dated: August 10<sup>th</sup> 2014

/s/ Jeremy Williams  
Jeremy Williams

United States District Court  
District Of New Jersey

Jeremy Williams  
Plaintiff-Claimant

:  
:

: No. 1:12-cv-00850-NLH-JS

:  
:

v.

: Civil Action

:  
:

Drug Enforcement Administration  
Defendant-Respondents

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:

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**Plaintiff's Request for Admissions From Defendant and moves for reduction  
of time for Government to Respond**

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Request for Admissions to DEA:

Comes now plaintiff, Jeremy Williams, files his request for Admissions pursuant to Fed. R. Civ. P., Rule 36. Since the court converted the parties pleadings from a motion to dismiss under 12(b) to one for Summary Judgement; the defendant answers to Admissions is critical for plaintiff to respond to Summary Judgement. These are the Admissions requests as it follows:

1. Admit that the government entity named in this lawsuit is the proper party to be sued.
2. Admit that the government took plaintiff's automobile, a 2006 BMW sedan, from plaintiff's home parking lot.
3. Admit that the government took plaintiff's automobile without a warrant.
4. Admit that any notice of the government's seizure or attempted forfeiture occurred while plaintiff was incarcerated in Metropolitan Correctional Center, 150 Park Row, New York, NY 10007.
5. Admit that under such circumstances plaintiff had no ability to exercise his right to claim automobile; because he was fighting for his freedom.
6. Admit that the said BMW was not part of plaintiff's indictment and there was no mention of said BMW being a part of plaintiff's plea when he was a defendant in MCC, New York in the year 2010.

7. Admit that over the past 10 years under these facts and circumstances the government has been ordered by a court with jurisdiction to return said automobile(s) to the owner.
8. Admit that in similar complaints the U. S. District Court's exercised jurisdictions, particularly in personal property claim cases.
9. Admit that in any separate hearing conducted by the government, no notice was ever submitted to plaintiff of a court date when the government sought to permanently deprive plaintiff of his BMW.
10. Admit that when the government acted to permanently deprive plaintiff of his BMW, the government knew where plaintiff was incarcerated. But failed to provide plaintiff with reasonable notice as required by the U. S. Constitution, 4th and 5th Amendments.
11. Admit that on September 21, 2010, plaintiff's attorneys, Abramson & Morak, submitted to the defendant, DEA, clearly proving that the subject BMW was not a drug related purchase, and that plaintiff purchased it from proceeds of a automobile accident in 2009. See Exhibits 1-7.
12. Admit that eventhough the government knew plaintiff did not use the said BMW to further any illegal drug activity, the DEA still seized the automobile. And, is now trying to keep plaintiff's BMW in violation of the federal laws and U. S. Constitution.
13. Admit that the plaintiff is a black male and that the agents who deprived plaintiff of his BMW were white males; and name the said white males.

Notice To Defendant, DEA

You are required to answer the above Admissions questions and state the name of the person answering. And, if you will not agree to provide such answers within 10 days(the law allows 30); the attached motion to shorten time to answer is here by filed with the court.

Dated: August 10<sup>th</sup> 2014

Respectfully Submitted,

  
Jeremy Williams, Plaintiff



Certificaton Of Service

I, Jeremy Williams, Hereby certify that I did cause to be mailed a true and correct copy of the within Admissions and exhibits to the following, via first class postage, from FPC-Schuylkill, P. O. Box 670, Minersville, PA 17954 on This 10<sup>th</sup> day of August 2014; To:

Paul J. Fishman  
United States Attorney  
970 broad Street, Suite 700  
Newark, New Jersey 07102

Certification In Lieu Of Oath

I, Jeremy Williams, hereby certify that the above statements made by me are true and correct, and I am aware of the penalties for false swearing. Invoking 28 USC § 1746, penalty of perjury.

Dated: August 10<sup>th</sup> 2014

/s/ Jeremy Williams  
Jeremy Williams